

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ALI KARIMI, Individually and on behalf of all others
similarly situated,

Plaintiff,

v.

DEUTSCHE BANK AKTIENGESELLSCHAFT,
JOHN CRYAN, AND CHRISTIAN SEWING,

Defendants.

Case No. 22-cv-2854 (JSR)

**[PROPOSED] ORDER CERTIFYING THE CLASS, APPOINTING CLASS
REPRESENTATIVES, AND APPOINTING CLASS COUNSEL**

The Court, having reviewed Plaintiffs' motion for class certification and all supporting and opposing papers thereon, and the Court finding that:

(a) under Rule 23(a)(1) the proposed Class is sufficiently numerous rendering joinder of all class members impracticable;

(b) under Rule 23(a)(2) there exist common questions of law and fact as to all class members, which include, *inter alia*: (i) whether Defendants' statements were materially false and misleading; (ii) whether the underlying misrepresentations and omissions were made with scienter; (iii) whether the price of Deutsche Bank's stock was artificially inflated during the Class Period; and (iv) whether Defendants' misrepresentations and omissions caused Class members to suffer economic losses;

(c) under Rule 23(a)(3) the claims and defenses of the proposed class representatives are typical of the claims and defenses of all class members in that: (1) the proposed representatives

purchased Deutsche Bank's securities during the Class Period; (2) the proposed representatives' claims, like those of all other Class members, derive from the same legal theories and the same misrepresentations and omissions;

(d) under Rule 23(a)(4) the proposed class representatives have demonstrated that each of them will fairly and adequately protect the interests of the Class;

(e) under Rule 23(g) the proposed lead counsel for the Class, Pomerantz LLP, has demonstrated that it is experienced in prosecuting class actions of this nature and will adequately represent the interests of the Class;

(f) under Rule 23(b)(3) the questions of law or fact are common to the members of the class (*e.g.*, whether Defendants have violated the federal securities laws, and if so, the appropriate measure of damages) and predominate over any questions affecting only individual members;

(g) a class action is superior to other available methods for the fair and efficient adjudication of the controversy given the inherent similarity of each of the claims and defenses to be asserted in the action and the adequacy of the class representative; and

(h) it appearing to the Court that good cause has been shown,

IT IS HEREBY ORDERED THAT

1. This case is certified as a class action pursuant to Rules 23(a) and 23(b)(3);
2. The "Class" of plaintiffs is defined as follows: All persons and entities other than Defendants, current or former officers and directors of Deutsche Bank, members of their immediate families and their legal representatives, heirs, successors or assigns, and any entity in which Defendants have or had a controlling interest who purchased or otherwise acquired Deutsche Bank securities between March 14, 2017, and September 18, 2020, both dates inclusive (the "Class Period") on (i) any stock

exchanges located in the United States, (ii) on any alternative trading systems located in the United States; or (iii) pursuant to other domestic transactions, seeking to recover damages caused by Defendants' violations of the federal securities laws and to pursue remedies under Sections 10(b) and 20(a) of the Securities Exchange Act of 1934 (the "Exchange Act") and Rule 10b-5 promulgated thereunder, against the Bank and certain of its top officials.

3. Lead Plaintiff Yun Wang and Named Plaintiff Ali Karimi are appointed as Class Representatives.
4. Pomerantz LLP is appointed as Class Counsel for all purposes in this action.

SO ORDERED.

Dated: _____, 2022
New York, New York

HONORABLE JED S. RAKOFF
UNITED STATES DISTRICT JUDGE
SOUTHERN DISTRICT OF NEW YORK